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May 7, 2021

**VIA ECF ONLY**

Magistrate Judge Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Ismael Hernandez Marcos v. Café Rivera Inc., et al.*  
Docket No. 19-cv-03981

Dear Honorable Sir:

The undersigned was recently retained to represent the Defendants in the above-referenced matter. A Notice of Appearance to that effect was filed with this Court on April 29, 2021.

This letter, however, is being sent to Your Honor on behalf of all counsel.

There is currently a deposition deadline of May 23, 2021 and a status conference scheduled for June 2, 2021. I have conferred with Mr. Amit Kumar, attorney for the Plaintiff herein, and we have agreed that we would like to revisit mediation prior to expending the time, money and other resources on depositions. Although an unsuccessful mediation session was held in July, 2020, legal counsel believes it is in the parties' best interest to hold one more mediation session in an attempt to resolve this matter.

Thus, it is respectfully requested that this Court issue a new Scheduling Order, allowing the Parties forty-five (45) days to hold an additional mediation session (i.e. on or before June 19, 2021), and then, if mediation not successful, forty-five (45) days thereafter (i.e. August 3, 2021) to conduct depositions. Of course, it would be necessary to adjourn the status conference until after August 3, 2021.

This application is being made on consent of all parties.

Respectfully yours,



David S. Feather